| 1 | Distant C. McConstant CDN 7249 | | |
|----|---|--|--|
| 2 | Richard G. McCracken, SBN 7248 Kristin L. Martin, SBN 7807 | | |
| | Luke Dowling (Admitted Pro Hac Vice) | | |
| 3 | | | |
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| | ldowling@msh.law | | |
| 8 | Attorneys for Defendant | | |
| 9 | UNITE HERE Bartenders Local 165 | | |
| 10 | UNITED STATES DISTRICT COURT | | |
| 11 | DISTRICT OF NEVADA | | |
| 12 | | CASE NO.: 2:20-cv-01287-JAD-NJK | |
| 13 | TRACY LALL, an individual; | CASE NO.: 2:20-cv-0128/-JAD-NJK | |
| 14 | Plaintiff, vs. | STIPULATION TO EXTEND BRIEFING DEADLINES | |
| 15 | CORNER INVESTMENT CO. dba THE CROMWELL HOTEL AND CASINO, et | (First Request) | |
| 16 | al., | | |
| 17 | Defendants. | | |
| 18 | | | |
| 19 | Plaintiff Tracey Lall, by and through her attorney, Michael J. McAvoyamaya, Esq.; | | |
| 20 | Defendant Corner Investment Co. dba The Cromwell Hotel and Casino, by and through its | | |
| 21 | attorney, Jacqueline A. Godoy, Esq.; and Defendant UNITE HERE Bartenders Local 165, by | | |
| 22 | and through its attorney, Luke Dowling, Esq. (collectively the "Parties") hereby respectfully | | |
| 23 | submit this Stipulation, Request, and Order Ex | atending Time to respond to the Parties' motions | |
| 24 | for summary judgment and reply in support of | their motions for summary judgment, which are | |

This is the first request for an extension of time to file responses and replies to the Parties' motions for summary judgement. The Parties' motions were filed on November 17,

currently due on December 8, 2021 and December 22, 2021 respectively. This Stipulation is

made in accordance with LR IA 6-1, LR IA 6-2, and LR 7-1 of the Local Rules of this Court.

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| 1 | 2021. Their responses would be due on December 8, 2021 and replies on December 22, 2021. | |
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| 2 | The below extensions are requested as counsel for the Parties require additional time to prepare | |
| 3 | their responses and replies and to accommodate the upcoming holidays. | |
| 4 | Upon agreement between all the Parties, the undersigned respectfully request the Court | |
| 5 | GRANT an extension of time to December 22, 2021 for the Parties to file their responses to the | |
| 6 | motions for summary judgment and January 14, 2022 for the Parties to file their replies in | |
| 7 | support of the motions for summary judgment. The proposed briefing schedule would be | |
| 8 | changed as follows: | |
| 9 | Present Response Deadline: December 8, 2021 | |
| 10 | Present Reply Deadline: December 22, 2021 | |
| 11 | Requested Response Deadline: December 22, 2021 | |
| 12 | Requested Reply Deadline: January 14, 2022 | |
| 13 | | |
| 14 | DATED this 1st day of December 2021. | |
| 15 | | |
| 16 | By: <u>/s/Jacqueline Godoy</u> Jacqueline a. Godoy, Esq. | |
| 17 | STOKES, WAGNER | |
| 18 | Nevada Bar No. 11385 jgodoy@stokeswagner.com | |
| 19 | 600 West Broadway, Suite 1600 | |
| | San Diego, CA 92101 Attorneys for Defendant Corner Investment Co. dba The | |
| 20 | Cromwell Hotel and Casino | |
| 21 | DATED this 1st day of December 2021. | |
| 22 | 211122 talls 150 ally 612 666 line 61 2621. | |
| 23 | By: /s/ Luke Dowling | |
| 24 | Luke Dowling (Admitted Pro Hac Vice) McCRACKEN, STEMERMAN & HOLSBERRY, LLP | |
| 25 | Las Vegas, NV 89102 | |
| 26 | Tel: (702)386-5107 Fax: (702)386-9848 | |
| 27 | ldowling@msh.law Attorneys for Defendant Unite Here Local 165 | |
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| 2 | DATED this 1st day of December 2021. | |
| 3 | By: <u>/s/ Michael J. McAvoy-Amaya</u> | |
| 4 | Michael J. McAvoy-Amaya | |
| 5 | McAvoy Amyaya & Revero Attorneys Nevada Bar No. 14082 | |
| 6 | 400 S. Fourth Street Ste 500 Las Vegas, NV 89101 | |
| 7 | Attorney for Plaintiff | |
| 8 | | |
| 9 | | |
| 10 | ORDER | |
| 11 | Based on the parties' stipulation [ECF No. 84] and good cause appearing, IT IS HEREBY | |
| 12 | ORDERED that the request to extend time is granted. The parties have until to December 2021, to file their responses to the motions for summary judgment, and until January 14, 202 | |
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| 14 | A rock of | |
| 15 | U.S. District Judge Jennifer A. Dorsey | |
| 16 | Dated: December 2, 2021 | |
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| | STIPULATION TO EXTEND BRIEFING DEADLINES CASE NO. 2:20-CV-01287-JAD-NJ | |

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